

**UNITED STATES BANKRUPTCY COURT  
EASTERN AND WESTERN DISTRICT OF ARKANSAS**

In re: MICHAEL SCOTT TURNER and SAMANTHA E TURNER

Case No: 4:15-bk-12436 T

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**OBJECTION TO CONFIRMATION OF PLAN  
AS AMENDED PRE-CONFIRMATION ON 6/24/15**

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Comes now Jack W Gooding, Standing Trustee for Chapter 13 cases, for his objection to the plan of the above debtor(s) states:

1. 11 U.S.C. 1325(b)(1) payments to be paid to unsecured creditors are inconsistent with disposable income. According to documentation provided by the debtors, they received an income tax refund in the sum of \$6,711.00.
2. 11 U.S.C. 1325(a)(1) the plan does not comply with the provisions of Chapter 13 and with other applicable provisions of the Bankruptcy Code. The debtors testified that the Jeep Wrangler was repossessed in April, 2015. The debtors should modify their plan and schedules accordingly. The debtor testified that he paid off a creditor, Cabot Trailer, prior to filing. The debtor should modify his Statement of Financial Affairs accordingly. The modified plan is unclear regarding the creditor Santander, therefore the Trustee is unable to determine the feasibility of the debtors' plan.
3. 11 U.S.C. 1325(a)(5) plan does not provide for the secured claim regarding Chrysler Capital in the sum of \$3,622.98, the secured claim regarding First Security Bank in the sum of \$2,438.69, and the secured claim regarding John Deere Financial in the sum of \$222.13.

Wherefore, your petitioner prays for an order denying confirmation of the plan and dismissing this case and for all other just and proper relief to which he may be entitled.

Dated: 7/9/2015

/s/ Jack W Gooding

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CHAPTER 13 TRUSTEE

**CERTIFICATE OF SERVICE**

I, Jack W Gooding, do hereby certify that a true and correct copy has been mailed this day, 7/9/2015, with sufficient postage to assure delivery to the following:

Michael Scott Turner And  
Samantha E Turner  
104 Kirkwood Dr  
Beebe, Ar 72012

Laura Grimes - Electronically by ECF

/s/ Jack W Gooding

CHAPTER 13 TRUSTEE